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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

JUSTIN MICHAEL WILKENS,

Plaintiff,

v.

**ROBERT WAYNE EDWARDS, in his
individual capacity; THE STATE OF
OREGON,**

Defendants.

Case No. 6:14-cv-00907-MC

**DECLARATION OF COUNSEL
LAUREN REGAN**

The undersigned, Lauren C. Regan, states as follows:

1. I am the attorney for Plaintiff Justin Wilkens in the above captioned case, and I make this declaration in support of Plaintiff's Summary Judgment Response. I have personal knowledge of the following and in competent to testify to the same.
2. The following is a list of true and correct copies of Exhibits filed in support of Plaintiffs response.

Pl. Ex. 1: Photos of defendant's police vehicle lights, plaintiff's motorcycle.

Pl. Ex. 2: OSP Kenyon interview. **REDACTED; FILED UNDER SEAL PER
SPO**

Pl. Ex. 3: Oregon State Police Defensive Tactics Instructor's Manual, B-111, B-114 (kicks are at the fifth level of the OSP's seven level force continuum; B-67-68 impact weapons must only be used when a suspect is engaged in active resistance).

REDACTED; FILED UNDER SEAL PER SPO

Pl. Ex. 4: OSP's Use of Force Continuum B-123 **REDACTED; FILED UNDER SEAL PER SPO**

Pl. Ex. 5: Oregon State Police Defensive Tactics Instructor's Manual, B: 860 pp. 35-36 (proper protocol for getting a person to their feet after engaged in high risk handcuffing). **REDACTED; FILED UNDER SEAL PER SPO**

Pl. Ex. 6: Relevant excerpts of plaintiff Justin Wilkens deposition taken on April 15, 2015.

Pl. Ex. 7: Relevant excerpts of defendant Robert Edwards deposition taken on April 29, 2015.

Pl. Ex. 8: Relevant excerpts of OSP David Peterson deposition taken on May 5, 2015.

Pl. Ex. 9: Relevant excerpts of OSP Scott Hite deposition taken on May 5, 2015.

Pl. Ex. 10: Relevant documentation regarding Mapleton bank robbery

Pl. Ex. 11: Lane County Sheriffs Office CAD and Incident Report

Pl. Ex. 12: OSP Notice of Reprimand. **REDACTED; FILED UNDER SEAL PER SPO**

Pl. Ex. 13: OSP use of force report: failure to activate siren. **REDACTED; FILED UNDER SEAL PER SPO**

Pl. Ex. 14: Sacred Heart emergency room medical records

Pl. Ex. 15: Dr. Boespflug medical record

I declare under penalty of perjury that the foregoing is true and correct.

DATED August 23, 2015.

/s/ Lauren C. Regan
Lauren C. Regan, OSB #970878
Attorney for Justin Michael Wilkens